

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION

IN RE:)	CASE NO. 21-13688-aih
)	
Susan Della Workman,)	CHAPTER 13
aka Susan D. Workman,)	
aka Susan Workman,)	JUDGE Arthur I. Harris
)	
Debtor.)	RESPONSE TO OBJECTION
)	TO CLAIM #5

COMES NOW, The Bank of New York Mellon fka The Bank of New York, as Trustee for The Certificate Holders of Cwalt, Inc., Alternative Loan Trust 2004-28CB, Mortgage Pass-Through Certificates, Series 2004-28CB, ("Secured Creditor"), and files this written response to Debtor's Amended Objection to Claim #5, [D.E. 31], and as grounds therefore states:

1. The Bank of New York Mellon fka The Bank of New York, as Trustee for The Certificate Holders of Cwalt, Inc., Alternative Loan Trust 2004-28CB, Mortgage Pass-Through Certificates, Series 2004-28CB is a secured creditor holding a purchase money security agreement against the Debtor's Property, 383 E. 327th Street, Willowick, OH 44095.
2. The Debtor filed a Chapter 13 Bankruptcy on October 30, 2021.
3. Secured Creditor filed Proof of Claim #5 on January 7, 2022.
4. Counsel for Debtor filed an Objection to Claim #5 on March 15, 2022.
5. Secured Creditor requests time to review the Objection to Claim #5 and respond accordingly.

WHEREFORE, Secured Creditor prays that the Court will allow time for the Secured Creditor to review and respond to the Objection to Claim filed by the Debtor's Attorney.

DATED this 6th day of April, 2022.

Respectfully submitted,

/s / Seth Greenhill
Seth Greenhill, Esq.
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was forwarded by either ECF Noticing or Regular U.S. Mail on April 6, 2022.

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Richard H. Nemeth, Attorney for the Debtor at rnemeth@ohbklaw.com
electronic notification

Lauren A. Helbling, Trustee at ch13trustee@ch13cleve.com
electronic notification

And by regular U.S. mail, postage prepaid, on:

Susan Della Workman, Debtor, 383 E. 327th Street, Eastlake, OH 44095

PADGETT LAW GROUP

/s/ Seth Greenhill
Seth Greenhill, Esq. (#99380)